

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TENNESSEE  
EASTERN DIVISION**

|                                   |   |                                  |
|-----------------------------------|---|----------------------------------|
| <b>UNITED STATES OF AMERICA,</b>  | ) |                                  |
|                                   | ) |                                  |
| <b>v.</b>                         | ) | <b>Cr. No. 1:19-cr-10040-JDB</b> |
|                                   | ) |                                  |
| <b>ALEXANDER ALPEROVICH, M.D.</b> | ) |                                  |

**DEFENDANT’S NOTICE OF OPINION TESTIMONY OF  
THOMAS VASTRICK PURSUANT TO  
FED. R. CRIM. PROC. 16(b)(1)(C)**

Comes the defendant, through counsel and pursuant to Fed. R. Crim. Proc. 16(b)(1)(C) and the Order on Discovery and Scheduling [Doc. 174], and herein respectfully submits the following notice of opinion testimony.

During the trial of this case, during his case in chief, the defendant anticipates calling Thomas W. Vastrick to provide expert testimony about the signatures alleged to belong to defendant, Dr. Alexander Alperovich, in patient charts seized by the government. Mr. Vastrick has been a forensic document examiner for over 42 years and is board certified through technical testing by the American Board of Forensic Document Examiners.

Mr. Vastrick’s opinion will be based upon his knowledge, education, and experience as reflected in his curriculum vitae (attached hereto as Exhibit 1) and the review of the materials detailed in his written reports, complete copies of which are being separately provided to counsel for the government on the date of this filing (via a reciprocal discovery letter attached hereto as Exhibit 2).

Respectfully submitted,

**RITCHIE, DILLARD, DAVIES & JOHNSON, P.C.**

/s/Stephen Ross Johnson

**STEPHEN ROSS JOHNSON, TN BPR #022140**

606 W. Main Street, Suite 300

Knoxville, TN 37902

(865) 637-0661

johnson@rddjlaw.com

**MASSEY MCCLUSKY MCCLUSKY & FUCHS**

/s/William D. Massey

**WILLIAM D. MASSEY, TN BPR #009568**

3074 East Street

Memphis, TN 38128

(901) 384-4004

w.massey3074@gmail.com

*Attorneys for Alexander Alperovich, M.D.*

### **CERTIFICATE OF SERVICE**

I hereby certify that on September 1, 2020, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. mail. Parties may access this filing through the Court's electronic filing system.

s/Stephen Ross Johnson